



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

March 17, 2021

**BY CM/ECF**

The Honorable Colleen McMahon  
Chief United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *United States v. Amir Bruno Elmaani*, 20 Cr. 661 (CM)**

Dear Chief Judge McMahon:

The Government writes to respectfully propose to the Court a set of agreed-upon bail conditions for the defendant Amir Bruno Elmaani. Defense counsel joins in this proposal.

The terms are as follows:

- A personal recognizance bond of \$1,000,000, to be cosigned by two financially responsible persons, and to be secured by the following property: (i) 1792 Needy Road, Martinsburg, West Virginia (the "West Virginia Home"), and (ii) 336 Switch Road, Hope Valley, Rhode Island (the "Rhode Island Home");
- Pretrial Services supervision as directed;
- Home detention with location monitoring, at the West Virginia Home;
- Inspection and approval of the West Virginia Home by Pretrial Services, before the defendant's release;
- Surrender all travel documents and make no new applications;
- Attend mental health treatment as directed by Pretrial Services;
- Refrain from possession of a firearm, destructive device or other dangerous weapon;
- Surrender all firearms and permits and provide written verification of the same to Pretrial Services;
- Refrain from soliciting or engaging in investment, purchase, or exchange of cryptocurrencies or tokens; and
- Travel restricted to the Southern and Eastern Districts of New York and the Northern District of West Virginia, as well as the Districts necessary to travel in between those Districts.

The parties propose that all terms must be satisfied before the defendant's release.

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney for the  
Southern District of New York

By: \_\_\_/s Margaret Graham\_\_\_\_\_

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